

MEMORANDUM ENDORSED



February 19, 2025

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Via ECF

Hon. Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

ROY W. BREITENBACH
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RE: Abadi v. NYU Langone Health System, et al., 1:21-cv-11073-RA-GWG

Dear Magistrate Judge Gorenstein:

We represent the Defendants in this action brought by *pro se* plaintiff, Aaron Abadi. We write to respectfully request a seventh extension of the deadline for the parties to file a motion for summary judgment. The deadline for either party to move for summary judgment is currently February 25, 2025. (Dkt. 96). Plaintiff consents to this application.

In support of this application, Defendants state as follows. Plaintiff recently inquired about whether Defendants would be open to settlement negotiations. The requested extension of the deadline for the parties to move for summary judgment would give Defendants an opportunity to see if our client is willing to enter into a meaningful dialogue with Plaintiff. Given this is a holiday week, we need additional time to connect with our client. Moreover, due to the legal complexity of this matter, i.e., the Second Amended Complaint contains fifteen (15) causes of action and 408 allegations, Defendants need additional time to evaluate potential settlement and prepare their motion for summary judgment. Further, due to the factual complexity of this matter, the parties need additional time to complete the joint statement of agreed upon facts. Although the parties have continued to work in good faith to work through these disputes, as explained in my last request for an extension, this process has taken more time than expected.

Accordingly, the parties jointly request this seventh extension, which will not affect any other deadlines in the case, and will extend the summary judgment filing deadline from February 25, 2025 to March 25, 2025.


Any motion for summary judgment is returnable before Judge Abrams, shall comply with her Individual Practices, and shall be filed by March 25, 2025.

Respectfully,

HARRIS BEACH MURTHA CULLINA PLLC

/s/ Roy W. Breitenbach
Roy W. Breitenbach

So Ordered.


GABRIEL W. GORENSTEIN
United States Magistrate Judge
February 19, 2025